Michael Cukor, Esq.

McGeary Cukor LLC

7 Dumont Place Morristown, NJ 07960

Evelyn A. Donegan, Esq. **Rubin, Kaplan and Associates** 20 Centennial Ave Piscataway, NJ 08854 Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

\_\_\_\_\_

VISION INDUSTRIES GROUP, INC.,

Plaintiff,

v,

ACU PLASMOLD, INC., and ABC COMPANIES 1-10, and XYZ CORPORATIONS 1-10,

Defendants.

Case No. 2:18-cv-06296-ES-CLW NOTICE OF MOTION FOR SANCTIONS AGAINST DEFENDANT

## TO COUNSEL OF RECORD:

PLEASE TAKE NOTICE that January 16, 2024 or as soon thereafter as counsel may be heard, pursuant to F.R.C.P. 37 and upon the Brief In Support of Motion for Sanctions and accompanying certification, and upon all prior proceedings, pleadings, and filings in this Action, Plaintiff will move before the Honorable Cathy L. Waldor, United States Magistrate Judge for the District of New Jersey, at the United States Courthouse for District of New Jersey, Martin

:

Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ, 07102, Court Room 4D, for an Order imposing sanctions on defendant, ACU Plasmold, Inc.

Dated: December 11, 2023

Respectfully Submitted,

By: /s/ Michael Cukor Michael Cukor, Esq. MCGEARY CUKOR LLC 7 Dumont Place Morristown, NJ 07960 (973) 339-7367

Evelyn A. Donegan, Esq. **RUBIN, KAPLAN & ASSOCIATES** A Professional Corporation 200 Centennial Avenue, Suite 110 Piscataway, New Jersey 08854 (732) 463-7511

Attorneys for Plaintiff Vision Industries Group, Inc.

## **CERTIFICATE OF SERVICE**

On December 11, 2023 erved a copy of this motion and accompanying brief and certification on all counsel of record using the Court's ECF system.

By: /s/Michael Cukor

Michael Cukor, Esq. MCGEARY CUKOR LLC

7 Dumont Place Morristown, NJ 07960 (973) 339-7367